

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**JEROME ROSS and EARNESTINE
ROSS,**

Plaintiff,

vs.

**PROGRESSIVE SPECIALTY
INSURANCE COMPANY**

Defendants.

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CASE NO. 2:07-CV-00792-WKW

**RENEWED MOTION TO WITHDRAW
AND MOTION TO EXTEND DEADLINES AND CONTINUE THE CASE**

COMES NOW, Jon M. Folmar, Attorney at Law, Moves to Withdraw on behalf of the Plaintiffs, Jerome and Earnestine Ross in the above styled cause. In support for said Motion the attorney for the Plaintiff would show as follows:

1. The attorney for the Plaintiffs is the second law firm that the Plaintiff hired to assist them in this matter. The Plaintiffs became dissatisfied with the first firm and hired the current attorney.
2. The Plaintiffs have been uncooperative, have been disrespectful to the attorney's employees, and have not followed the attorney's direction or advice.
3. The Plaintiffs have indicated that they no longer wish to be represented by said attorney and desire to hire another attorney. Plaintiffs further have received a copy of the entire case file. This attorney has been contacted by another firm whom Mr. Ross has been to see.

4. The Plaintiff's attorney cannot properly respond to the Defendant's Motion for Summary Judgement without the cooperation of the Plaintiffs who no longer desire to be represented by the attorney of record.

5. The Plaintiffs need sufficient time to hire new counsel to respond to the Motion for Summary Judgement and the deadlines.

WHEREFORE, for premises shown the attorney for the Plaintiffs respectfully requests that this Court grant his request to withdraw and extend the deadlines and trial in this case in order to allow the Plaintiffs sufficient time to find new counsel.

Respectfully Submitted this *27th day of March, 2008*.

/s/ JON M. FOLMAR

Jon M. Folmar (FOL007)

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on the opposing counsel in this matter by placing a copy of the same in the U.S. Mail, on this *27th day of March, 2008*, to the following:

Evan P. Baggett, Esq.
Bradford & Sears, P.C.
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Jerome Ross
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Troy, Alabama 36081

/s/ JON M. FOLMAR

OF COUNSEL